

Brian C. Rocca, Bar No. 221576
brian.rocca@morganlewis.com
Sujal J. Shah, Bar No. 215230
sujal.shah@morganlewis.com
Michelle Park Chiu, Bar No. 248421
michelle.chiu@morganlewis.com
Minna Lo Naranjo, Bar No. 259005
minna.naranjo@morganlewis.com
Rishi P. Satia, Bar No. 301958
rishi.satia@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Telephone: (415) 442-1000
Facsimile: (415) 442-1001

Richard S. Taffet, *pro hac vice*
richard.taffet@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
101 Park Avenue
New York, NY 10178-0060
Telephone: (212) 309-6000
Facsimile: (212) 309-6001

Willard K. Tom, *pro hac vice*
willard.tom@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004-2541
Telephone: (202) 739-3000
Facsimile: (202) 739-3001

Attorneys for Defendants

Daniel M. Petrocelli, Bar No. 97802
dpetrocelli@omm.com
O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 7th Fl.
Los Angeles, CA 90067-6035
Telephone: (310) 553-6700

Ian Simmons, *pro hac vice*
isimmons@omm.com
Benjamin G. Bradshaw, Bar No. 189925
bbradshaw@omm.com
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006-4001
Telephone: (202) 383-5106
Facsimile: (202) 383-5414

E. Clay Marquez, Bar No. 268424
emarquez@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111
Telephone: (415) 984-8700
Facsimile: (415) 984-8701

Stephen J. McIntyre, Bar No. 274481
smcintyre@omm.com
O'MELVENY & MYERS LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071-2899
Telephone: (213) 430-6000
Facsimile: (213) 430-6407

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC, Case No.
3:20-cv-05671-JD

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

*In re Google Play Developer Antitrust
Litigation*, Case No. 3:20-cv-05792-JD

Utah v. Google LLC, Case No. 3:21-cv-
05227-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF ANDREW ROPE
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION IN
RESPONSE TO MOTIONS TO SEAL
PORTIONS OF COMPLAINTS**

Judge James Donato

1 I, Andrew Rope, declare as follows:

2 1. I am currently a Senior Legal Project Manager for Defendant Google, LLC (along
3 with Google-affiliated entities, "Google"). I have been employed by Google since February 2018
4 and have held my current position since July 2019. Over the course of my employment at
5 Google, I have acquired personal knowledge of Google's practices and procedures concerning the
6 maintenance of the confidentiality of its strategic, business, and marketing information.

7 2. I submit this declaration in support of Google's Response to Motions to Seal
8 Portions of Complaints (*In re Google Play Store Antitrust Litigation*, Case No. 3:21-md-02981-
9 JD, ECF Nos. 62, 63, 65; *Epic Games, Inc. v. Google LLC*, Case No. 3:20-cv-05671-JD, ECF No.
10 157; *In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-JD, ECF No.
11 185; *In re Google Play Developer Antitrust Litigation*, Case No. 3:20-cv-05792-JD, ECF No.
12 128; *Utah v. Google LLC*, Case No. 3:21-cv-05227-JD, ECF No. 93). The sealed material reveals
13 confidential information produced by Google pursuant to civil investigative demands compelling
14 production of the materials in which the confidential information appears.

15 3. The contents of this declaration are true and correct to the best of my knowledge,
16 information and belief, and are based on my personal knowledge of Google's policies and
17 practices as they relate to the treatment of confidential information, the materials that were
18 provided to me and reviewed by me, or conversations with other knowledgeable employees of
19 Google. If called upon as a witness in this action, I could and would testify competently thereto.

20 4. Google follows a strict practice that requires confidential treatment of all internal
21 business analyses of consumer spending and revenue, market conditions and opportunities, future
22 strategic business plans, and agreements with third-parties. In my experience and to the best of
23 my knowledge, Google does not disclose internal documents of this nature outside of the
24 company.

25 5. The disclosure of Google's confidential internal business analyses, revenue
26 breakdowns, and business strategies could significantly harm Google's relationships and ability to
27 conduct business with counterparties and prospective counterparties, and could place it at a
28 disadvantage with competitors who could use Google's confidential analyses to their advantage in

1 competition with Google. These materials therefore have economic value from not being
2 generally known to Google's competitors, counterparties, or the general public.

3 6. The Ninth Circuit has held that sealing of papers is proper where the motion to seal
4 is supported by "compelling reasons." *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172,
5 1179 (9th Cir. 2006).

6 7. To the best of my knowledge, the following information in the complaints that are
7 the subject of Google's Response to Motions to Seal Portions of Complaints is highly sensitive
8 and confidential, and derives from confidential materials Google produced in response to civil
9 investigative demands. Google has both good cause and compelling reasons to seal this
10 confidential information.

11 **Specific Information in Complaints to Be Sealed**

12 **State Attorney Generals' First Complaint for Injunctive Relief**

13 **(Exhibit A)**

14 8. Paragraph 76, page 26, line 25 (between "confirmed that" and "including the
15 United States."). This information contains non-public information regarding confidential
16 business analyses of competitors. If revealed to competitors and potential business
17 counterparties, they could use this non-public and confidential information to disadvantage
18 Google in marketing and in negotiations.

19 9. Paragraph 76, page 27, line 1 between "only" and "of." This information contains
20 non-public information regarding confidential business analyses of competitors. If revealed to
21 competitors and potential business counterparties, they could use this non-public and confidential
22 information to disadvantage Google in marketing and in negotiations.

23 10. Paragraph 86, page 30, line 21 (beginning after "stated that") to the end of the
24 sentence on line 24 (ending before "Rather"), and line 24 after "Rather" to line 25 (before
25 "instead"). This information contains non-public information regarding confidential business
26 strategies with respect to potential contractual counterparties. If revealed to competitors and
27 potential business counterparties, they could use this non-public and confidential information to
28 disadvantage Google in marketing and in negotiations.

11. Paragraph 101, page 35, line 26 (beginning after “refrain from”) to page 36, line 1 (ending before “(“anti-fragmentation provision”).” This information contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

12. Paragraph 111, page 39, line 1 (beginning after “stated that”) to the end of the sentence on line 2 (ending before “One key”), line 3 (beginning after “was”) to the end of the sentence on line 3 (ending before “In response”), and line 4 (beginning after “among other things, to”) to the end of the sentence on line 5, excluding “(emphasis in original).” This information contains non-public information regarding confidential business strategies with respect to potential contractual counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

13. Paragraph 123, page 41, line 14 between “placement exclusivity” and “Nokia.” This information contains non-public information regarding confidential business negotiations with a potential contractual counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

14. Paragraph 127, page 43, line 1 (beginning after “discussing”) to line 2 (ending before “to address”), line 2 (between “address the” and “of MNOs”). This information contains non-public information regarding confidential business negotiations with a potential contractual counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

15. Paragraph 128, page 43, line 8 (beginning after “time that”) and ending at the end of the sentence on line 9 (ending before “In 2009”). This information contains non-public information regarding the terms of confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential

1 information to disadvantage Google in marketing and in negotiations.

2 16. Paragraph 128, page 43, line 11-12 (between “received” and “of a given
3 purchase”), line 12 (between “received” and “and Google”), line 12 (between “remaining” and
4 “for”), line 13 (between “its” and “Google understood”). This information contains non-public
5 information regarding the terms of confidential agreements with counterparties. If revealed to
6 competitors and potential business counterparties, they could use this non-public and confidential
7 information to disadvantage Google in marketing and in negotiations.

8 17. Paragraph 128, page 43, line 13 (between “this” and “revenue share”). This
9 information contains non-public financial information. If revealed to competitors and potential
10 business counterparties, they could use this non-public and confidential information to
11 disadvantage Google in marketing and in negotiations.

12 18. Paragraph 129, page 43, line 20 (after “approximately”) to the end of the sentence
13 on line 21. This information contains non-public information regarding confidential business
14 strategies and negotiations with potential contractual counterparties. If revealed to competitors
15 and potential business counterparties, they could use this non-public and confidential information
16 to disadvantage Google in marketing and in negotiations.

17 19. Paragraph 130, page 44, line 1 (beginning after “gets us”) to line 2 (ending before
18 “while the”), line 2-3 (between “while the” and “(but”), and line 3 (beginning after “(but” to the
19 end of the sentence on line 3). This information contains non-public information regarding
20 confidential business strategies and negotiations with potential contractual counterparties. If
21 revealed to competitors and potential business counterparties, they could use this non-public and
22 confidential information to disadvantage Google in marketing and in negotiations.

23 20. Paragraph 131, page 44, line 7 (between “called” and “which required”), line 9
24 (between “dubbed project” and “and”), and line 11 (after “project”) to the end of the sentence.
25 This information contains non-public information regarding confidential business strategies and
26 terms offered during negotiations with a potential contractual counterparty. If revealed to
27 competitors and potential business counterparties, they could use this non-public and confidential
28 information to disadvantage Google in marketing and in negotiations.

21. Paragraph 132, page 44, line 21 (beginning after “identifies”) to line 22 (before “as a solution”). This information contains non-public information regarding confidential business strategies with respect to a potential contractual counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

22. Paragraph 133, page 45, line 5 (between “only” and “of the time”). This information contains non-public information regarding confidential business analyses of competitors. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

23. Paragraph 133, page 45, line 11 (beginning at “estimated at”) to the end of the sentence (ending before “This exclusive”). This information contains non-public information regarding the revenue effects of an event. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

24. Paragraph 135, pages 45, line 24 (between “initiative” and “focused on”), line 24-25 (between “focused on” and “and attempted”), line 27 (beginning after “abandon its”) to page 46, line 2 (before “Samsung to abandon”), page 46, line 3 (between “Samsung Galaxy Store,” and “as an integrated approach”), and page 46, line 5 (beginning after “sideloading”) to the end of the sentence on line 8. This information contains non-public information regarding confidential business strategies and non-public information regarding terms offered during negotiations with a potential contractual counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

25. Paragraph 136, page 46, line 11 (between “With” and “Google initially”), and line 12 (between “up to” and “in return”). This information contains non-public information regarding a confidential business strategy and terms offered during negotiations with a potential contractual counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and

1 in negotiations. Further, the information implicates a third-party's confidentiality interests.

2 26. Paragraph 136, page 46, line 16 (beginning after “thereby would”) to the end of
3 the sentence on line 17 (ending before “At the”), line 17-18 (between “would obtain” and “for
4 Android”), line 18 (beginning after “not”) to the end of the sentence (ending before “These”), and
5 line 18 (between “These” and “would include”). This information contains non-public
6 information regarding terms offered during negotiations with a potential contractual counterparty.
7 If revealed to competitors and potential business counterparties, they could use this non-public
8 and confidential information to disadvantage Google in marketing and in negotiations.

9 27. Paragraph 136, page 46, line 24 (beginning after “using a”) to line 25 (ending
10 before “(Google offered”), and line 25 (beginning after “Samsung would”) to the end of the
11 paragraph on line 26. This information contains non-public information regarding terms offered
12 during negotiations with a potential contractual counterparty. If revealed to competitors and
13 potential business counterparties, they could use this non-public and confidential information to
14 disadvantage Google in marketing and in negotiations. Further, the information implicates a
15 third-party's confidentiality interests.

16 28. Paragraph 136, page 47, line 2 (beginning after “YouTube”) to line 5 (ending
17 before “and”). This information contains non-public information regarding terms offered during
18 negotiations with a potential contractual counterparty. If revealed to competitors and potential
19 business counterparties, they could use this non-public and confidential information to
20 disadvantage Google in marketing and in negotiations.

21 29. Paragraph 136, page 47, line 7 (beginning after “publisher”) to line 8 at the end of
22 the sentence. This information contains non-public information regarding a confidential business
23 strategy and terms offered during negotiations with a potential contractual counterparty. If
24 revealed to competitors and potential business counterparties, they could use this non-public and
25 confidential information to disadvantage Google in marketing and in negotiations. Further, the
26 information implicates a third-party's confidentiality interests.

27 30. Paragraph 136, page 47, line 9 (beginning after “Samsung’s”) to line 10 (ending
28 before “to make competition”). This information contains non-public information regarding

1 terms offered during negotiations with a potential contractual counterparty. If revealed to
2 competitors and potential business counterparties, they could use this non-public and confidential
3 information to disadvantage Google in marketing and in negotiations.

4 31. Paragraph 137, page 47, line 12 (beginning at the start of the paragraph) and
5 ending before “was scheduled.” This information contains non-public information regarding
6 terms offered during negotiations with a potential contractual counterparty. If revealed to
7 competitors and potential business counterparties, they could use this non-public and confidential
8 information to disadvantage Google in marketing and in negotiations.

9 32. Paragraph 137, page 47, line 14 (beginning after “Samsung”) to the end of the
10 sentence on line 16. This information contains non-public information regarding terms offered
11 during negotiations with a potential contractual counterparty. If revealed to competitors and
12 potential business counterparties, they could use this non-public and confidential information to
13 disadvantage Google in marketing and in negotiations. Further, the information implicates a
14 third-party's confidentiality interests.

15 33. Paragraph 138, page 47, line 20 (beginning after “the need to”) to line 20 (ending
16 before “to OEMs”), line 22 (between “avoid the” and “figure”), and line 23 (beginning after
17 “substantial”) until the end of the sentence (ending before “Google foresaw”). This information
18 contains non-public information regarding confidential business strategies with respect to
19 negotiations with potential contractual counterparties. If revealed to competitors and potential
20 business counterparties, they could use this non-public and confidential information to
21 disadvantage Google in marketing and in negotiations.

22 34. Paragraph 138, page 47, line 26 (between “in order to” and “when”). This
23 information contains non-public information regarding confidential business strategies with
24 respect to negotiations with a potential contractual counterparty. If revealed to competitors and
25 potential business counterparties, they could use this non-public and confidential information to
26 disadvantage Google in marketing and in negotiations.

27 35. Paragraph 139, page 48, line 4 (beginning at the start of the paragraph) and ending
28 before “negotiations,” line 5 (between “terminated” and “and”), and line 6 (between “titled” and

1 “was merely”). This information contains non-public information regarding terms offered during
 2 negotiations with a potential contractual counterparty. If revealed to competitors and potential
 3 business counterparties, they could use this non-public and confidential information to
 4 disadvantage Google in marketing and in negotiations.

5 36. Paragraph 139, page 48, line 7 (beginning after “According to Google, the”) to line
 6 9 at the end of the sentence. This information contains non-public information regarding
 7 confidential business strategies with respect to negotiations with a potential contractual
 8 counterparty. If revealed to competitors and potential business counterparties, they could use this
 9 non-public and confidential information to disadvantage Google in marketing and in negotiations.

10 37. Paragraph 140, page 48, line 10 (between “to the” and “was the”), and 11
 11 (beginning after “revenues for”) to line 12 at the end of the sentence (ending before “That
 12 proposal”). This information contains non-public information regarding confidential business
 13 strategies with respect to negotiations with a potential contractual counterparty. If revealed to
 14 competitors and potential business counterparties, they could use this non-public and confidential
 15 information to disadvantage Google in marketing and in negotiations.

16 38. Paragraph 141, page 48, line 15 (beginning at the start of the paragraph) to the end
 17 of the sentence on line 19 (ending before “Any app”). This information contains non-public
 18 information regarding confidential business strategies with respect to negotiations with a potential
 19 contractual counterparty. If revealed to competitors and potential business counterparties, they
 20 could use this non-public and confidential information to disadvantage Google in marketing and
 21 in negotiations.

22 39. Paragraph 142, page 48, lines 24-25 (between “With” and “Google intended”).
 23 This information contains non-public information regarding confidential business strategies and
 24 terms offered during negotiations with a potential contractual counterparty. If revealed to
 25 competitors and potential business counterparties, they could use this non-public and confidential
 26 information to disadvantage Google in marketing and in negotiations.

27 40. Paragraph 143, page 49, line 2 (between “support” and “Google also”), and line 4
 28 (beginning after “To do so, Google”) to the end of the sentence on line 6 (ending before “Google

coined”). This information contains non-public information regarding confidential business strategies and terms offered during negotiations with potential contractual counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

41. Paragraph 143, page 49, line 6 (beginning after “this strategy”) to the end of the paragraph on line 7. This information contains non-public information regarding confidential business strategies and terms offered during negotiations with potential contractual counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

42. Paragraph 144, page 49, line 9 (beginning after “scheme”) to the end of the paragraph on line 10. This information contains non-public information regarding a confidential business strategy and terms offered during negotiations with a potential contractual counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

43. Paragraph 144, page 49, figure 4 in its entirety. This information contains non-public information regarding a confidential business strategy and terms offered during negotiations with a potential contractual counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

44. Paragraph 146, page 50, line 9 (between “quantified the” and “of Epic’s”), line 9 (beginning after “decision as”) to line 10 at the end of the sentence (ending before “For Google”), and line 11 (beginning after “that”) to line 12 at the end of the sentence (ending before “This threat”). This information contains non-public information regarding potential revenue effects and confidential business strategies with respect to potential contractual counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

45. Paragraph 147, page 50, line 16 (beginning after “Staff felt that”) to the end of the

1 paragraph on line 19. This information contains non-public information regarding confidential
2 business strategies with respect to potential contractual counterparties. If revealed to competitors
3 and potential business counterparties, they could use this non-public and confidential information
4 to disadvantage Google in marketing and in negotiations. Further, the information implicates a
5 third-party's confidentiality interests.

6 46. Paragraph 148, page 50, line 20 (beginning after “Figure 5”) to line 21 (ending
7 before “as well as”), and line 23 (beginning after “combat the”) to the end of the paragraph on
8 line 24. This information contains non-public information regarding terms offered during
9 negotiations with potential contractual counterparties. If revealed to competitors and potential
10 business counterparties, they could use this non-public and confidential information to
11 disadvantage Google in marketing and in negotiations.

12 47. Paragraph 148, page 51, figure 5 in its entirety. This information contains non-
13 public information revealing confidential business strategies. If revealed to competitors and
14 potential business counterparties, they could use this non-public and confidential information to
15 disadvantage Google in marketing and in negotiations.

16 48. Paragraph 149, page 51, line 19 (between “the” and “succeeded”), and line 20
17 (between “developer” and “from following”). This information contains non-public information
18 regarding confidential business strategies with respect to potential contractual counterparties. If
19 revealed to competitors and potential business counterparties, they could use this non-public and
20 confidential information to disadvantage Google in marketing and in negotiations. Further, the
21 information implicates a third-party's confidentiality interests.

22 49. Paragraph 149, page 51, line 21 (between “Google saw” and “overarching”), line
23 21 (between “as an” and “to protect Play Store” on line 22), line 22 (between “revenues by” and
24 “while allowing”), line 23 (between “Google to” and “By the end”), and line 23 (between “2020”
25 and “top app developers”). This information contains non-public information regarding
26 confidential business strategies with respect to potential contractual counterparties. If revealed to
27 competitors and potential business counterparties, they could use this non-public and confidential
28 information to disadvantage Google in marketing and in negotiations.

50. Paragraph 183, page 59, line 18 (between “decade later” and “which totaled” on line 19), and line 19 (beginning after “totaled some”) to the end of the paragraph. This information contains non-public financial information. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

51. Paragraph 186, page 60, line 14 (between “collected” and “in overall”), line 14 (between “booked” and “in ‘Gross Profit’”), line 15 (between “and” and “in ‘Operating Income’”), and line 15 (between “over” and “that combines”). This information contains non-public information regarding revenue, costs, and profit margins. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

52. Paragraph 189, page 61, line 2 (between “asked” and “and”), and line 3 (beginning after “responded”) to the end of the paragraph. This information contains non-public information regarding pricing. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

53. Paragraph 192, page 61, line 14 (between “suggested that a” and “commission”). This information contains non-public information regarding confidential business strategies with respect to pricings. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

**Epic Games, Inc.’s First Amended Complaint for Injunctive Relief
(Exhibit B)**

54. Paragraph 33, page 13, line 5 (beginning after “Activision Blizzard”) to the end of the sentence on line 6 (ending before “These deals”). This information contains non-public information revealing confidential business strategies regarding negotiations with potential counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in

1 negotiations.

2 55. Paragraph 62, page 22, line 27 (beginning after “creating or promoting”) to page
3 23, line 2 to the end of the paragraph. This information contains non-public information
4 revealing confidential business strategies regarding negotiations with potential counterparties. If
5 revealed to competitors and potential business counterparties, they could use this non-public and
6 confidential information to disadvantage Google in marketing and in negotiations.

7 56. Paragraph 76, page 27, line 19 (beginning after “confirmed that”) to line 20
8 (ending before “Google has”), and line 22 (between “mere” and “of”). This information contains
9 non-public information revealing confidential internal business analyses. If revealed to
10 competitors and potential business counterparties, they could use this non-public and confidential
11 information to disadvantage Google in marketing and in negotiations.

12 57. Paragraph 87, page 32, line 5 (beginning after “Apple”) to line 8 (ending before
13 “For example”). This information contains non-public information revealing confidential
14 business strategies. If revealed to competitors and potential business counterparties, they could
15 use this non-public and confidential information to disadvantage Google in marketing and in
16 negotiations.

17 58. Paragraph 88, page 33, line 7 (beginning after “notes reflect:” to the end of the
18 paragraph at line 7. This information contains non-public information revealing confidential
19 business strategies and negotiations with a counterparty. If revealed to competitors and potential
20 business counterparties, they could use this non-public and confidential information to
21 disadvantage Google in marketing and in negotiations.

22 59. Paragraph 94, page 34, line 19 (between “Google Play Store” and “ensuring”).
23 This information contains non-public information revealing confidential business strategies
24 regarding negotiations with potential counterparties. If revealed to competitors and potential
25 business counterparties, they could use this non-public and confidential information to
26 disadvantage Google in marketing and in negotiations.

27 60. Paragraph 96, page 35, line 9 (beginning after “certain OEMs”) to line 10 (ending
28 before “Pursuant to”), and line 11 (beginning after “agrees”) to line 13 (ending before “As

described below”). This information contains non-public agreements with contractual counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

61. Paragraph 97, page 35, line 24 (beginning after “poorly—”) to line 26 (ending before “But Epic’s”). This information contains non-public information regarding confidential business analyses of a competitor. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

62. Paragraph 98, page 36, line 4 (beginning after “Google’s”) to the end of the sentence on line 7 (ending before “Google feared”), line 8 (beginning after “Google feared that the”) to the end of the sentence on line 13 (ending before “And”), line 14 (beginning after “And finally, Google even”) to the end of the sentence on line 17 (ending before “Google also”), and line 18 (beginning after “recognized that the”) to line 19 (ending before “facing its monopoly”). This information contains non-public information revealing confidential business strategies regarding negotiations with potential counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

63. Paragraph 99, pages 36, line 21 (between “prevent this” and “was its decision”), line 22 (beginning after “Google Play”) to the end of the sentence on page 37, line 3 (ending before “The”), and line 4 (beginning after “included the”) to the end of the paragraph on line 13. This information contains non-public information revealing confidential business strategies regarding negotiations with a potential counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

64. Paragraph 101, page 37, line 20 (beginning after “accept its offer”) to the end of the paragraph on line 28. This information contains non-public information revealing confidential business strategies regarding negotiations with a potential counterparty. If revealed

1 to competitors and potential business counterparties, they could use this non-public and
2 confidential information to disadvantage Google in marketing and in negotiations.

3 65. Paragraph 103, page 38, line 14 (beginning after “OEMs”) to line 20 (ending
4 before the word “Indeed”), and line 21 (beginning after “recognized that”) to page 39, line 4
5 (ending at the end of the paragraph). This information contains non-public information revealing
6 confidential business strategies and forward-looking projections. If revealed to competitors and
7 potential business counterparties, they could use this non-public and confidential information to
8 disadvantage Google in marketing and in negotiations.

9 66. Paragraph 105, page 39, line 11 (beginning after “this way”) to the end of the
10 paragraph on page 40, line 4. This information contains non-public information revealing
11 confidential business strategies, the terms of agreements with counterparties, and negotiation
12 positions with counterparties. If revealed to competitors and potential business counterparties,
13 they could use this non-public and confidential information to disadvantage Google in marketing
14 and in negotiations.

15 67. Paragraph 106, page 40, line 5 (starting at the beginning of the paragraph) and
16 ending before “to take one”, and line 6 (beginning after “illustrative example”) to the end of the
17 paragraph on line 8. This information contains non-public information regarding the terms of a
18 confidential agreement with a counterparty. If revealed to competitors and potential business
19 counterparties, they could use this non-public and confidential information to disadvantage
20 Google in marketing and in negotiations.

21 68. Paragraph 107, page 40, line 9 (starting at the beginning of the paragraph) and
22 ending at the end of the paragraph at line 15. This information contains non-public information
23 regarding the terms of a confidential agreement with a counterparty. If revealed to competitors
24 and potential business counterparties, they could use this non-public and confidential information
25 to disadvantage Google in marketing and in negotiations.

26 69. Paragraph 108, page 40, line 16 (beginning after “Moreover”) to line 17 (before
27 “Epic believes”); line 18 (beginning after “based on”) to line 20 (before “that this document”);
28 line 21 (beginning after “anticompetitive requirements”) to the end of the sentence on line 28; line

28 (beginning after “Google further instructs”) to the end of the sentence on page 41, line 2; line 2 (beginning after “Google also”) to the end of the paragraph on line 8. This information contains non-public information regarding the terms of a confidential agreement with a counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

70. Paragraph 109, page 41, line 9 (beginning after “As a further restriction”) to the end of the paragraph on line 17. This information contains non-public information regarding the terms of a confidential agreement with a counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

71. Paragraph 110, page 41, line 18 (beginning after “In addition”) to the end of the paragraph on line 21. This information contains non-public information regarding the terms of a confidential agreement with a counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

72. Paragraph 111, page 41, line 22 (beginning after “More recently”) to the end of the paragraph on page 42 on line 3. This information contains non-public information regarding the terms of confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

73. Paragraph 112, page 42, line 5 (beginning after “resounding success”) to the end of the paragraph on line 20. This information contains non-public information regarding confidential business strategies and confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

74. Paragraph 113, page 42, line 21-22 (between “that the” and “had ‘impacted’”), and line 22-23 (between “apps by” and “thus intentionally”). This information contains non-public information regarding confidential business strategies and confidential agreements with

1 counterparties. If revealed to competitors and potential business counterparties, they could use
2 this non-public and confidential information to disadvantage Google in marketing and in
3 negotiations

4 75. Paragraph 114, page 43, line 14 (between “Another OEM” and “LG”). This
5 information contains non-public information regarding a confidential agreement with a
6 counterparty. If revealed to competitors and potential business counterparties, they could use this
7 non-public and confidential information to disadvantage Google in marketing and in negotiations.

8 76. Paragraph 115, page 43, line 19 (beginning after “Google’s”) and ending before
9 “was not publicly known”, line 22 (beginning after “provision”) to the end of the sentence on line
10 24, and page 44, line 9 (beginning after “Google Play”) to the end of the sentence on line 10
11 (ending before “(Dkt. 91)”). This information contains non-public information revealing
12 confidential business strategies, the terms of agreements with counterparties, and negotiation
13 positions with counterparties. If revealed to competitors and potential business counterparties,
14 they could use this non-public and confidential information to disadvantage Google in marketing
15 and in negotiations.

16 77. Paragraph 118, page 45, line 4 (beginning at the start of the paragraph) to the end
17 of the sentence on line 7 (ending before “Beginning”), line 10 (beginning after “typically
18 received” to line 11 (ending before “and Google”), line 11 (beginning after “remaining”) to line
19 12 (ending before the phrase, “Google understood”), line 12 (between “this” and “revenue”), and
20 line 13 (beginning after “MNOs”) to the end of the paragraph on line 14. This information
21 contains non-public information regarding confidential business strategies and confidential
22 agreements with counterparties. If revealed to competitors and potential business counterparties,
23 they could use this non-public and confidential information to disadvantage Google in marketing
24 and in negotiations.

25 78. Paragraph 119, page 45, line 17 (beginning after “actual foreclosure”) to line 23 at
26 the end of the sentence, line 23 (beginning after “First, Google”) to page 46, line 2 at the end of
27 the sentence, and line 2 (beginning after “Second”) to line 20 at the end of the paragraph. This
28 information contains non-public information regarding confidential business strategies and

1 confidential negotiations with a potential counterparty. If revealed to competitors and potential
2 business counterparties, they could use this non-public and confidential information to
3 disadvantage Google in marketing and in negotiations.

4 79. Paragraph 120, pages 46-47, line 21 (starting at the beginning of the paragraph) to
5 the end of the paragraph on page 47, line 3. This information contains non-public information
6 regarding confidential business strategies and confidential negotiations with a potential
7 counterparty. If revealed to competitors and potential business counterparties, they could use this
8 non-public and confidential information to disadvantage Google in marketing and in negotiations.

9 80. Paragraph 121, page 47, line 4 (starting at the beginning of the paragraph) until the
10 end of the sentence on line 5 (ending before “However”), and line 12 (beginning after “that
11 Google”) to the end of the paragraph on line 16. This information contains non-public
12 information regarding confidential business strategies for negotiations with a potential
13 counterparty. If revealed to competitors and potential business counterparties, they could use this
14 non-public and confidential information to disadvantage Google in marketing and in negotiations.

15 81. Paragraph 128, page 49, line 9 (beginning after “Third”) to page 50, line 2 at the
16 end of the paragraph. This information contains non-public information regarding confidential
17 business strategies as to negotiations with counterparties and confidential agreements with
18 counterparties. If revealed to competitors and potential business counterparties, they could use
19 this non-public and confidential information to disadvantage Google in marketing and in
20 negotiations.

21 82. Paragraph 175, page 64, line 2 (beginning after “this by”) to line 5 (ending before
22 “by restricting”). This information contains non-public information regarding confidential
23 business strategies as to negotiations with counterparties and confidential agreements with
24 counterparties. If revealed to competitors and potential business counterparties, they could use
25 this non-public and confidential information to disadvantage Google in marketing and in
26 negotiations.

27 83. Paragraph 182, page 65, line 8 (beginning after “include”) to line 11 at the end of
28 the sentence, and line 11 (beginning after “agreements that”) to line 12 at the end of the

paragraph. This information contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

84. Paragraph 227, page 72, line 11 (beginning after “include”) to line 14 at the end of the sentence, and line 14 (beginning after “agreements that”) to line 15 at the end of the paragraph. This information contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

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85. Paragraph 7, page 3, line 14 (beginning after “entering new”) to the end of the paragraph on line 18. This information contains non-public information regarding the terms of confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

86. Paragraph 11, page 4, line 12 (between “States” and “of devices”). This information contains non-public information regarding an internal analysis. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

87. Paragraph 63, page 20, line 11 (beginning after “since 2019”) to the end of the paragraph on line 14. This information contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

88. Paragraph 75, page 25, line 15 (beginning after “separate”) to line 16 (ending before “that date”), and line 17 (beginning after “at”) to the end of the paragraph on line 18. This

1 information contains non-public information regarding confidential business strategies and the
2 terms of confidential agreements with counterparties. If revealed to competitors and potential
3 business counterparties, they could use this non-public and confidential information to
4 disadvantage Google in marketing and in negotiations

5 89. Paragraph 76, page 25, line 20 (beginning after “Google began”) to the end of the
6 paragraph on page 26, line 7. This information contains non-public information regarding
7 confidential business strategies and the terms of confidential agreements with counterparties. If
8 revealed to competitors and potential business counterparties, they could use this non-public and
9 confidential information to disadvantage Google in marketing and in negotiations.

10 90. Paragraph 76, page 26, line 2, fn. 63 between “between” and “and Google”, and
11 beginning after “states that” to the end of the footnote. This information contains non-public
12 information regarding the terms of a confidential agreement with a counterparty. If revealed to
13 competitors and potential business counterparties, they could use this non-public and confidential
14 information to disadvantage Google in marketing and in negotiations.

15 91. Paragraph 76, page 26, line 3, fn. 64 between “For example, Google’s” and
16 “required”, between “required” to “During negotiations”, and after “During negotiations Google”
17 to the end of the footnote. This information contains non-public information regarding
18 confidential negotiation positions and the terms of a confidential agreement with a counterparty.
19 If revealed to competitors and potential business counterparties, they could use this non-public
20 and confidential information to disadvantage Google in marketing and in negotiations.

21 92. Paragraph 77, page 26, line 9 (beginning after “executive:”) to the end of the
22 sentence on line 10 (ending before “And having”), and line 10 (beginning after “succeeded”) to
23 line 11 (ending before “The numbers”). This information contains non-public information
24 regarding confidential business strategies and the terms of confidential agreements with
25 counterparties. If revealed to competitors and potential business counterparties, they could use
26 this non-public and confidential information to disadvantage Google in marketing and in
27 negotiations.

28 93. Paragraph 86, page 29, line 5 (after the phrase, “Google had made”) to line 6

(before the “These sales data”). This information contains non-public information regarding Play revenues. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

94. Paragraph 93, page 31, line 15 (beginning after “Galaxy Store”) to line 21 at the end of the paragraph. This information contains non-public information regarding a confidential agreement with a counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

95. Paragraph 94, page 31, line 22 (beginning after “that Google”) to page 32, line 2 at the end of the paragraph. This information contains non-public information regarding confidential business strategies and negotiations with a counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

96. Paragraph 94, page 32, line 2, fn. 75 between “codenamed” and “and later”, between “and later” and “that, while”, and between “that, while” to the end of the footnote. This information contains non-public information regarding confidential negotiations with a counterparty. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

97. Paragraph 110, page 37, line 3 (beginning after “in 2019”) to the end of the paragraph on line 11. This information contains non-public information regarding the terms of confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

98. Paragraph 111, page 37, line 14 (between “power in” and “Google itself”), and line 15 (beginning after “the new”) to the end of the paragraph on line 15. This information contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage

1 Google in marketing and in negotiations.

2 99. Paragraph 111, page 37, line 15, fn. 87 starting at the beginning of the footnote to
3 page 38 at the end of the footnote. This information contains non-public information regarding
4 the terms of a confidential agreement with a counterparty. If revealed to competitors and
5 potential business counterparties, they could use this non-public and confidential information to
6 disadvantage Google in marketing and in negotiations.

7 100. Paragraph 112, page 38, line 1 starting at the beginning of the paragraph to line 13
8 at the end of the paragraph. This information contains non-public information regarding
9 confidential business strategies and the terms of confidential agreements with counterparties. If
10 revealed to competitors and potential business counterparties, they could use this non-public and
11 confidential information to disadvantage Google in marketing and in negotiations.

12 101. Paragraph 114, page 39, line 1 (beginning after “OEM that”) to line 1 before
13 “which also”; line 4 (beginning after “used”) to the end of the paragraph on line 4. This
14 information contains non-public information regarding the terms of a confidential agreement with
15 a counterparty. If revealed to competitors and potential business counterparties, they could use
16 this non-public and confidential information to disadvantage Google in marketing and in
17 negotiations.

18 102. Paragraph 115, page 39, line 5 (between “that the” and “had”), line 5 (between
19 “had” and “its apps” on line 6), and line 9 (beginning after “purpose was”) to the end of the
20 paragraph. This information contains non-public information regarding the terms of a
21 confidential agreement with a counterparty. If revealed to competitors and potential business
22 counterparties, they could use this non-public and confidential information to disadvantage
23 Google in marketing and in negotiations.

24 103. Paragraph 119, page 40, line 12 (beginning after “and by”) to line 13 (ending
25 before “These barriers”). This information contains non-public information regarding
26 confidential business strategies. If revealed to competitors and potential business counterparties,
27 they could use this non-public and confidential information to counter Google’s competitive
28 strategy.

1 104. Paragraph 121, page 41, line 7 (between “*only*” and “of devices”). This
2 information contains non-public information regarding internal analyses. If revealed to
3 competitors and potential business counterparties, they could use this non-public and confidential
4 information to disadvantage Google in marketing and in negotiations.

5 105. Paragraph 121, page 41, line 8, fn. 91 (between “2016” and “of Android”). This
6 information contains non-public information regarding confidential business analyses of
7 competitors. If revealed to competitors and potential business counterparties, they could use this
8 non-public and confidential information to disadvantage Google in marketing and in negotiations.

9 106. Paragraph 130, page 46, line 11 (beginning after “Rather”) to line 12 before
10 “(And, of course”). This information contains non-public information regarding confidential
11 negotiations with a counterparty. If revealed to competitors and potential business counterparties,
12 they could use this non-public and confidential information to disadvantage Google in marketing
13 and in negotiations.

14 107. Paragraph 133, page 47, line 10 (beginning after “to gain scale”) to the end of the
15 paragraph on line 14. This information contains non-public information regarding confidential
16 negotiations with a potential counterparty. If revealed to competitors and potential business
17 counterparties, they could use this non-public and confidential information to disadvantage
18 Google in marketing and in negotiations.

19 108. Paragraph 134, page 47, line 15 (starting at the beginning of the paragraph) to the
20 end of the paragraph on line 20. This information contains non-public information regarding
21 confidential business strategies and internal business analyses. If revealed to competitors and
22 potential business counterparties, they could use this non-public and confidential information to
23 disadvantage Google in marketing and in negotiations.

24 109. Paragraph 150, page 54, line 15 (beginning after “boasted that its”) to line 17
25 (ending before “that is”), and line 19 (beginning after “that there”) to the end of the paragraph on
26 line 23. This information contains non-public information regarding confidential business
27 strategies. If revealed to competitors and potential business counterparties, they could use this
28 non-public and confidential information to counter Google’s competitive strategy.

110. Paragraph 150, page 54, line 23, fn. 106 beginning after “restraints” to the end of the footnote. This information contains non-public information regarding confidential business strategies with respect to potential contractual counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

111. Paragraph 151, page 55, line 2 (beginning after “as of”) to the end of the paragraph on line 2. This information contains non-public information regarding internal data. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

112. Paragraph 153, page 55, line 5 (beginning after “in a 2018”) to the end of the paragraph on line 12. This information contains non-public information regarding confidential business strategies with respect to a nonparty competitor. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to counter Google’s competitive strategy.

113. Paragraph 156, page 55, line 21 (beginning after “Google’s fear of a”) to the end of the paragraph on page 56, line 2. This information contains non-public information regarding confidential business strategies with respect to potential contractual counterparties. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

114. Paragraph 170, page 60, line 14 (beginning after “2009 that”) to line 15 (ending before “and today”), and line 15 (beginning after “costs at”) to the end of the paragraph at line 17. This information contains non-public information regarding pricings. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

115. Paragraph 174, page 61, line 14 (between “set at” and “But for”). This information contains non-public information regarding costs and pricing. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

116. Paragraph 176, page 61, line 22 (beginning after “their company’s”) to the end of the sentence on line 22 (ending before “One”), and line 23 (beginning after “presentation states”) to the end of the paragraph on line 25. This information contains non-public information regarding costs. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

117. Paragraph 180, page 62, line 15, fn. 122 beginning after “figures are” and ending before “as noted,” and after “processing costs at” to the end of the sentence. This information contains non-public information regarding costs. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

118. Paragraph 197, page 67, line 26 (beginning after “processing costs”) to the end of the sentence on line 26 (ending before “These companies”). This information contains non-public information regarding costs. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

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119. Paragraph 50, page 12, line 24 between “Indeed, only” and “of active.” This information contains non-public information regarding confidential business analyses. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

120. Paragraph 76, page 17, line 28 (between “more than” and “Android”), and page 18, line 3 (between “more than” and “of Android”). This information contains non-public information regarding internal analyses. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations.

121. Paragraph 82, page 19, line 4 (between “revenues of” and “accounting”, line 4

1 (between “for over” and “percent”), and line 5 (beginning after “year of”) to the end of the
2 sentence. This information contains non-public information regarding Play revenues. If revealed
3 to competitors and potential business counterparties, they could use this non-public and
4 confidential information to disadvantage Google in marketing and in negotiations.

5 122. Paragraph 84, page 19, line 21 (beginning after “detailed below”) to the end of the
6 paragraph on line 25, ending before “(emphasis added).” This information contains non-public
7 information regarding confidential business strategies and confidential negotiations with a
8 counterparty. If revealed to competitors and potential business counterparties, they could use this
9 non-public and confidential information to disadvantage Google in marketing and in negotiations.

10 123. Paragraph 85, page 19, line 27 (beginning after “important applications”) to page
11 20, line 9 (ending before “In short”). This information contains non-public information regarding
12 confidential business strategies and confidential negotiations with a counterparty. If revealed to
13 competitors and potential business counterparties, they could use this non-public and confidential
14 information to disadvantage Google in marketing and in negotiations.

15 124. Paragraph 86, page 20, line 10 (beginning after “Google to”) to line 15 (ending
16 before “allowing”). This information contains non-public information regarding confidential
17 business strategies with respect to a potential counterparty. If revealed to competitors and
18 potential business counterparties, they could use this non-public and confidential information to
19 disadvantage Google in marketing and in negotiations.

20 125. Paragraph 87, page 20, line 19 (beginning after “Samsung agreeing”) to the end of
21 the paragraph on line 22. This information contains non-public information regarding
22 confidential business strategies and confidential negotiations with a counterparty. If revealed to
23 competitors and potential business counterparties, they could use this non-public and confidential
24 information to disadvantage Google in marketing and in negotiations.

25 126. Paragraph 88, page 20, line 26 (between “made around” and “in sales”). This
26 information contains non-public information revealing confidential business revenues and a
27 confidential assessment of a competitor. If revealed to competitors and potential business
28 counterparties, they could use this non-public and confidential information to disadvantage

1 Google in marketing and in negotiations.

2 127. Paragraph 106, page 24, line 19 (beginning after “memorandum” to the end of the
3 paragraph on line 23. This information contains non-public information regarding confidential
4 business strategies. If revealed to competitors and potential business counterparties, they could
5 use this non-public and confidential information to disadvantage Google in marketing and in
6 negotiations.

7 128. Paragraph 109, page 25, line 11 (between “pre-install up to” and “mandatory”);
8 line 13 (beginning after “other services”) to the end of the paragraph on line 16. This information
9 contains non-public information regarding confidential business strategies with respect to
10 potential contractual counterparties. If revealed to competitors and potential business
11 counterparties, they could use this non-public and confidential information to disadvantage
12 Google in marketing and in negotiations. Further, the information implicates a third-party's
13 confidentiality interests.

14 129. Paragraph 110, page 25, line 18 (beginning after “for flexibility”) to the end of the
15 paragraph on line 21. This information contains non-public information regarding confidential
16 negotiations with a potential counterparty. If revealed to competitors and potential business
17 counterparties, they could use this non-public and confidential information to disadvantage
18 Google in marketing and in negotiations.

19 130. Paragraph 113, page 26, line 8 (between “covering over” and “of”). This
20 information contains non-public information regarding confidential negotiations with a potential
21 counterparty. If revealed to competitors and potential business counterparties, they could use this
22 non-public and confidential information to disadvantage Google in marketing and in negotiations.

23 131. Paragraph 116, page 27, line 3 (starting at the beginning of the paragraph) to the
24 end of the paragraph on line 8. This information contains non-public information regarding
25 confidential business strategies. If revealed to competitors and potential business counterparties,
26 they could use this non-public and confidential information to disadvantage Google in marketing
27 and in negotiations.

28 132. Paragraph 117, page 27, line 9 (starting at the beginning of the paragraph) to the

1 end of the paragraph on line 14. This information contains non-public information regarding
2 confidential business strategies. If revealed to competitors and potential business counterparties,
3 they could use this non-public and confidential information to disadvantage Google in marketing
4 and in negotiations.

5 133. Paragraph 118, page 27, line 15 (starting at the beginning of the paragraph) to line
6 16 (ending before “So, Google”), and line 19 (beginning after “Google Play.”) to the end of the
7 paragraph on line 21. This information contains non-public information regarding the terms of
8 confidential agreements with counterparties. If revealed to competitors and potential business
9 counterparties, they could use this non-public and confidential information to disadvantage
10 Google in marketing and in negotiations.

11 134. Paragraph 119, page 27, line 22 (beginning after “Amazon Store”) to the end of
12 the paragraph on line 24. This information contains non-public information regarding
13 confidential business strategies with respect to potential contractual counterparties. If revealed to
14 competitors and potential business counterparties, they could use this non-public and confidential
15 information to disadvantage Google in marketing and in negotiations. Further, the information
16 implicates a third-party's confidentiality interests.

17 135. Paragraph 120, page 27, line 26 (beginning after “For instance”) to page 28, line 2
18 to the end of the paragraph. This information contains non-public information regarding
19 confidential business strategies with respect to potential contractual counterparties. If revealed to
20 competitors and potential business counterparties, they could use this non-public and confidential
21 information to disadvantage Google in marketing and in negotiations. Further, the information
22 implicates a third-party's confidentiality interests.

23 136. Paragraph 123, page 28, line 16 (beginning after “OEMs may only”) to line 20
24 (ending before “Further, because”), and line 22 (beginning after “to competitors.”) to the end of
25 the paragraph on line 26. This information contains non-public information regarding the terms
26 of a confidential agreement with a counterparty. If revealed to competitors and potential business
27 counterparties, they could use this non-public and confidential information to disadvantage
28 Google in marketing and in negotiations.

1 137. Paragraph 129, page 29, line 23 (beginning after “Indeed”) to the end of the
2 paragraph on line 28. This information contains non-public information regarding the terms of a
3 confidential agreement with a counterparty. If revealed to competitors and potential business
4 counterparties, they could use this non-public and confidential information to disadvantage
5 Google in marketing and in negotiations.

6 138. Paragraph 130, page 30, line 3 (between “there be” and “for GMSA apps”); line 3
7 (beginning after “for GMSA apps”) to the end of the paragraph on line 5. This information
8 contains non-public information regarding confidential business strategies with respect to
9 counterparties in confidential agreements. If revealed to competitors and potential business
10 counterparties, they could use this non-public and confidential information to disadvantage
11 Google in marketing and in negotiations.

12 139. Paragraph 131, page 30, line 9 (beginning after “2014 presentation”) to the end of
13 the paragraph on line 10. This information contains non-public information regarding
14 confidential business strategies with respect to counterparties in confidential agreements. If
15 revealed to competitors and potential business counterparties, they could use this non-public and
16 confidential information to disadvantage Google in marketing and in negotiations.

17 140. Paragraph 132, page 30, line 14 (beginning after “recognized that”) to the end of
18 the paragraph on line 15. This information contains non-public information regarding
19 confidential business strategies with respect to counterparties in confidential agreements. If
20 revealed to competitors and potential business counterparties, they could use this non-public and
21 confidential information to disadvantage Google in marketing and in negotiations.

22 141. Paragraph 133, page 30, line 16 (beginning after “Weaving the”) to line 17 (ending
23 before “with major”), and line 18 (beginning after “car...”) to the end of the paragraph on line 19.
24 This information contains non-public information regarding confidential business strategies with
25 respect to counterparties in confidential agreements. If revealed to competitors and potential
26 business counterparties, they could use this non-public and confidential information to
27 disadvantage Google in marketing and in negotiations.

28 142. Paragraph 134, page 30, line 21 (beginning after “respond by”) to the end of the

1 paragraph on line 23. This information contains non-public information regarding confidential
2 business strategies with respect to counterparties in confidential agreements. If revealed to
3 competitors and potential business counterparties, they could use this non-public and confidential
4 information to disadvantage Google in marketing and in negotiations.

5 143. Paragraph 135, page 30, line 24 (starting at the beginning of the paragraph) to
6 page 31, line 3 at the end of the paragraph. This information contains non-public information
7 regarding confidential business strategies and the terms of confidential agreements with
8 counterparties. If revealed to competitors and potential business counterparties, they could use
9 this non-public and confidential information to disadvantage Google in marketing and in
10 negotiations.

11 144. Paragraph 136, page 31, line 4 (beginning after “that over”) to line 6 (ending
12 before “it remains”), and line 7 (between “have entered” and Google’s intent”). This information
13 contains non-public information regarding confidential business strategies with respect to
14 potential counterparties in confidential agreements. If revealed to competitors and potential
15 business counterparties, they could use this non-public and confidential information to
16 disadvantage Google in marketing and in negotiations.

17 145. Paragraph 137, page 31, line 11 (beginning after “Google employee”) to the end of
18 the paragraph on line 17. This information contains non-public information regarding
19 confidential business strategies with respect to potential counterparties in confidential
20 agreements. If revealed to competitors and potential business counterparties, they could use this
21 non-public and confidential information to disadvantage Google in marketing and in negotiations.

22 146. Paragraph 138, page 31, line 19 (between “more than” and “per year”), and line 19
23 (beginning after “by 2023”) to the end of the paragraph on line 20. This information contains
24 non-public information regarding confidential business strategies with respect to confidential
25 agreements. If revealed to competitors and potential business counterparties, they could use this
26 non-public and confidential information to disadvantage Google in marketing and in negotiations.

27 147. Paragraph 144, page 32, line 18 (beginning after “In 2014”) to line 22 (ending
28 before “This ensured”). This information contains non-public information regarding confidential

1 business strategies with respect to potential counterparties in confidential agreements. If revealed
2 to competitors and potential business counterparties, they could use this non-public and
3 confidential information to disadvantage Google in marketing and in negotiations.

4 148. Paragraph 158, page 36, line 3 (beginning after ““unknown””) to line 4 (ending
5 before “Google admits”), line 6 (beginning after ““proven a big risk.””) to line 8 (ending before
6 “Thus, Google”), and line 10 (beginning after “that app store”) to the end of the paragraph on line
7 11. This information contains non-public information regarding confidential business strategies
8 and confidential negotiations with a counterparty. If revealed to competitors and potential
9 business counterparties, they could use this non-public and confidential information to
10 disadvantage Google in marketing and in negotiations.

11 149. Paragraph 187, page 42, line 24 (beginning after “In particular”) to the end of the
12 paragraph on line 27. This information contains non-public information regarding confidential
13 negotiations with a potential contractual counterparty. If revealed to competitors and potential
14 business counterparties, they could use this non-public and confidential information to
15 disadvantage Google in marketing and in negotiations.

16 150. Paragraph 193, page 44, line 7 (between “than the” and “revenue share”). This
17 information contains non-public information regarding costs and profit margins. If revealed to
18 competitors and potential business counterparties, they could use this non-public and confidential
19 information to disadvantage Google in marketing and in negotiations.

20 151. Paragraph 194, page 44, line 11 (beginning after “recognize that”) to the end of the
21 paragraph on line 13. This information contains non-public information regarding costs and
22 profit margins. If revealed to competitors and potential business counterparties, they could use
23 this non-public and confidential information to disadvantage Google in marketing and in
24 negotiations.

25 152. Paragraph 195, page 44, line 14 (beginning after “has”) to the end of the paragraph
26 on line 15. This information contains non-public information regarding costs and profit margins.
27 If revealed to competitors and potential business counterparties, they could use this non-public
28 and confidential information to disadvantage Google in marketing and in negotiations.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 5th day of August, 2021, in Aptos, California.

Andrew Pope

Andrew Rope